

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Pennsylvania

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United States of America

v.

Walter Morgan a/k/a Walter Eduardo Morgan  
Gomez

Case No.

13-604M

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Jan 13, 2010 to March 22, 2010 in the county of Philadelphia in the  
Eastern District of Pennsylvania, the defendant(s) violated:

Code Section

Offense Description

42 U.S.C. § 408(a)(7)(b)

See Attachment A

18 U.S.C. § 1001

18 U.S.C. § 2

This criminal complaint is based on these facts:

See attached Affidavit

☒ Continued on the attached sheet.

*Kevin S. Crawford*  
Complainant's signature

Kevin S. Crawford, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 05/13/2013

*M. Faith Angell*  
Judge's signature

City and state: Philadelphia, Pennsylvania

HONORABLE M. FAITH ANGELL

Printed name and title

**ATTACHMENT A**

**Count One**

From on or about January 13, 2010 to on or about August 30, 2010, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

**WALTER MORGAN**  
**a/k/a "Walter Eduardo Morgan Gomez,"**

for the purpose of obtaining and retaining employment, knowingly and willfully, and with intent to deceive, falsely represented a number, specifically, a nine-digit number ending in -1629, to be the social security account number assigned by the Commissioner of Social Security to him, when in fact such number was not the social security account number assigned by the Commissioner of Social Security to him.

In violation of Title 42, United States Code, Section 408(a)(7)(B) and Title 18, United States Code, Section 2.

**Count Two**

On or about January 13, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**WALTER MORGAN**  
**a/k/a "Walter Eduardo Morgan Gomez,"**

in a matter within the jurisdiction of the Department of Homeland Security, U.S. Citizenship and Immigration Services, an agency of the executive branch of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations in that defendant WALTER MORGAN a/k/a "Walter Eduardo Morgan Gomez," claimed to be a United States citizen named Walter E. Morgan, with social security number xxx-xx-1629, in an "Employment Eligibility Verification," Form I-9, which he provided to his employer, when, as the defendant knew, he was not a citizen, was not named Walter E. Morgan, and had not had a social security number assigned to him by the Commissioner of Social Security.

In violation of Title 18, United States Code, Section 1001 and 2.

**ATTACHMENT A**

**Count One**

From on or about January 13, 2010 to on or about August 30, 2010, in Philadelphia, in the Eastern District of Pennsylvania, and elsewhere, defendant

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**a/k/a "Walter Eduardo Morgan Gomez,"**

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On or about January 13, 2010, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**WALTER MORGAN**  
**a/k/a "Walter Eduardo Morgan Gomez,"**

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In violation of Title 18, United States Code, Section 1001 and 2.




AFFIDAVIT

I, Kevin S. Crawford, being duly sworn, depose and state as follows:

1. I am a Special Agent with the Social Security Administration (SSA), Office of the Inspector General (OIG), Office of Investigations (OI), assigned to investigate violations of law to include fraud and abuse within SSA programs. I have been a Special Agent with the SSA/OIG/OI since February 2010 and have six and a half years of law-enforcement experience investigating fraud violations of the state and federal crimes codes. I have conducted numerous investigations relating to violations of Title 42 United States Code, Section 408 and 1383 (Social Security Fraud), Section 1028 (Identity Theft), and Title 18 United States Code, Section 1001 (False Statements). The information contained in this affidavit was obtained from my review of documents obtained through grand jury subpoenas and search warrants, from agency records, and from information conveyed to me by other law enforcement personnel.
2. The Alpha-Liberty Joint Venture (the "Joint Venture") was one of the contractors performing work on the federally funded repainting and resurfacing project on the Girard Point Bridge between at least January and August 2010. In accordance with the terms of the contract and the obligations imposed by federal law, the Joint Venture submitted to the Pennsylvania Department of Transportation certified records of at least the hourly wage employees performing work on the Girard Point Bridge project, located in Philadelphia, Pennsylvania, under the Joint Venture's contract. Among the employees listed by the Joint Venture for the time period November 2009 through August 2011 was an employee named Walter Morgan, with last four digits of his social security number listed as 1629.
3. The Joint Venture's personnel file for Walter Morgan included: (i) an employment application listing the name Walter E. Morgan with social security number xxx-xx-1629; (ii) an IRS Form W-4, dated 1-13-10, in the name Walter E. Morgan with social security number xxx-xx-1629; (iii) copies of a series of identification documents in the name Walter Morgan, Walter E. Morgan, and Walter Eduardo Morgan Gomes, some with photographs; (iv) a copy of a social security card in the name Walter Eduardo Morgan with social security number xxx-xx-1629; and (v) an IRS Form W-4, dated 3-22-10, in the name Walter E. Morgan with social security number xxx-xx-1629. The employment application and the Form I-9 both had check marks in boxes representing that Morgan was a citizen of the United States.
4. Several employees of the Joint venture have identified a photograph of Walter Morgan. The person pictured in the photo-identification in the Joint venture personnel file of Walter Morgan is the same person as the person identified by the Joint Venture employees.

5. Records of the Social Security Administration establish that the social security number that Walter Morgan claimed as his own was in fact issued to an individual, identified here as C.D.J. C.D.J. is a resident of North Carolina. At the times that Walter Morgan prepared the documents in his personnel file using social security number xxx-xx-1629 and was working for the Joint Venture in Philadelphia, federal wage summary reports collected by U.S. Department of Labor establish that C.D.J. was living and working and earning income in North Carolina.
6. Based on the foregoing, I request that a complaint and warrant issue for the arrest of Walter E. Morgan, a/k/a Walter Eduardo Morgan Gomes, for violation of 42 U.S.C. Section 408(a)(7)(B) and 18 Sections 1001 and 2.

  
Kevin S. Crawford  
Social Security Administration,  
Office of the Inspector General,  
Office of Investigations

Sworn to before me this 13 day  
of May, 2013.

  
HONORABLE M. FAITH ANGELL  
United States Magistrate Judge